

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

SUPPLEMENTAL DECLARATION OF CHRIS HARVEY

Pursuant to 28 U.S.C. § 1746, I, CHRIS HARVEY, make the following declaration:

1.

My name is Chris Harvey. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I currently am the Director of Elections for the State of Georgia. I have held that position since July 2015. From August 2007 to July 2015, I was the Chief Investigator and Deputy Inspector General for the Secretary of State's office, investigating, among other things, potential violations of state election

law. For more than a decade, I have acquired firsthand knowledge of Georgia's election processes at both the state and county level.

3.

The June 9, 2020 primary was a combination of the Presidential Preference Primary ("PPP") and the General Primary, as a result of the delays in the elections due to COVID-19.

4.

Voters received one of five different types of ballots for the election: (1) Democratic PPP, Democratic Primary, and Nonpartisan General Election Ballot for those voters who had not already voted in the PPP; (2) Democratic Primary and Nonpartisan General Election Ballot (without the PPP) for voters who had already voted in the PPP before the election was delayed; (3) Republican PPP, Republican Primary, and Nonpartisan General Election Ballot for those voters who had not already voted in the PPP; (4) Republican Primary and Nonpartisan General Election Ballot (without the PPP) for voters who had already voted in the PPP before the election was delayed; and (5) a Nonpartisan General Election Ballot.

5.

Voters who had already voted in the PPP and then voted on June 9 would not see the presidential candidates on their ballot because they had already voted in the PPP.

6.

The election for Sen. Isakson's seat will not take place until the November election. O.C.G.A. § 21-2-542. The primary for Sen. Perdue's seat was on primary ballots for the June 9 election.


7.

In a primary election, candidate affiliations are not included on the ballot because all candidates on the ballot for the primary are in the same political party.

8.

Our office has engaged in extensive planning efforts with counties and Dominion to remedy the issues that arose during the June 9 election.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 4th day of September, 2020.



CHRIS HARVEY